

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE: STEEL ANTITRUST  
LITIGATION**

**Case No. 08-cv-5214**

**Honorable James B. Zagel**

**THIS DOCUMENT RELATES TO ALL  
DIRECT PURCHASER ACTIONS:**

*Standard Iron Works v. ArcelorMittal, et al.,*  
Case No. 08-cv-5214

*Wilmington Steel Processing Co., Inc. v.*  
*ArcelorMittal, et al.,* Case No. 08-cv-5371

*Capow, Inc. d/b/a Eastern States Steel v.*  
*ArcelorMittal, et al.,* Case No. 08-cv-5633

*Alco Industries, Inc. v. ArcelorMittal, et al.,*  
Case No. 08-cv-6197

*Gulf Stream Builders Supply, Inc. v.*  
*ArcelorMittal, et al.,* Case No. 10-cv-4236

**DIRECT PURCHASER PLAINTIFFS' MOTION FOR FINAL APPROVAL OF  
SETTLEMENTS WITH COMMERCIAL METALS COMPANY,<sup>1</sup> AK STEEL  
HOLDING CORPORATION, AND GERDAU AMERISTEEL CORPORATION, FOR  
PAYMENT OF THE EXPENSES OF NOTICE AND  
SETTLEMENT ADMINISTRATION, AND FOR REIMBURSEMENT  
OF LITIGATION EXPENSES TO CLASS COUNSEL**

Plaintiffs Standard Iron Works, Wilmington Steel Processing Co., Inc., Capow, Inc. d/b/a Eastern States Steel, Alco Industries, Inc., and Gulf Stream Builders Supply, Inc., on behalf of themselves and a Settlement Class of direct purchasers of Steel Products ("Direct Purchaser

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<sup>1</sup> Commercial Metals Company is improperly named as "Commercial Metals, Inc." in the caption of the Complaint but is otherwise correctly named in the body of the Complaint.

Plaintiffs”), respectfully move this Court for an order granting final approval of the settlements reached between the Direct Purchaser Plaintiffs and defendants Commercial Metals Company (“CMC”), AK Steel Holding Corporation (“AK Steel”), and Gerdau Ameristeel Corporation (“Gerdau”) (collectively, “Settling Defendants”), for payment of notice and settlement administration costs from the settlement funds, and for reimbursement of litigation expenses to class counsel from the settlement funds. In support of this motion, Direct Purchaser Plaintiffs rely on and incorporate by reference the facts and legal arguments set forth in the accompanying Memorandum of Law in Support of Motion for Final Approval of Settlements with Commercial Metals Company, AK Steel Holding Corporation and Gerdau Ameristeel Corporation, for Payment of the Expenses of Notice and Settlement Administration, and For Reimbursement of Litigation Expenses to Class Counsel and accompanying exhibits (“Memorandum of Law”).

Settling Defendants do not oppose this motion.

WHEREFORE, and for the reasons in the Memorandum of Law, Direct Purchaser Plaintiffs respectfully request that the Court issue an Order finally approving the settlements; finally certifying a Settlement Class; granting the applications of certain persons to be excluded from the Class; confirming the appointment of Representative Plaintiffs and of Co-Lead Counsel for the Class; directing that final judgment be entered by the clerk pursuant to Federal Rule of Civil Procedure 54(b); ordering payment of \$115,131.37 in settlement administration expenses from the settlement funds; reimbursing Co-Lead Counsel for \$5,064,908.97 in litigation expenses from the settlement funds; and for such other and further orders as the Court deems appropriate.

Dated: July 3, 2014

Respectfully submitted,

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